

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

SUSAN SHOEMAKER, )  
                        )  
Plaintiff,           )  
                        )  
v.                    )      No.: 08 cv 14  
                        )  
CHELCIE McCONNELL and )      Jury Trial Demanded  
STACEY McCONNELL,    )  
                        )  
Defendants.          )

**ANSWER TO COMPLAINT**

1.     Denied.
2.     Denied.
3.     Denied.
4.     Admitted.
5.     Admitted.
6.     Admitted.
7.     Admitted.
8.     Denied.

**COUNT I**

9.     Defendants repeat answers to paragraphs 1 through 8.
10.    Denied.

**COUNT II**

11.    Defendants repeat answers to paragraphs 1 through 10.
12.    Admitted.
13.    Denied.

**COUNT III**

14. Defendants repeat answers to paragraphs 1 through 13.
15. Denied.
16. Denied.

**AFFIRMATIVE DEFENSES**

17. The Court lacks subject matter jurisdiction.
18. The Court lacks personal jurisdiction.
19. There is improper venue in that the accident occurred in Ohio and the defendants are residents of Ohio.
20. There is insufficiency of process upon the defendants.
21. There is insufficiency of service of process upon the defendants.

CASARINO, CHRISTMAN & SHALK, P.A.

/s/ Stephen P. Casarino  
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Attorney for the Defendants

DATED: February 18, 2008

**CERTIFICATE OF SERVICE**

I, Stephen P. Casarino, Esq., hereby certify that I have caused to be deposited in the mailbox at 800 North King Street, Suite 200, Wilmington, DE 19801, on this 18<sup>th</sup> day of February 2008, a true and correct copy of the attached Notice of Deposition to:

Vincent J.X. Hedrick, II  
Law office of Beverly L. Bove  
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